

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division

UNITED STATES OF AMERICA,)	
)	
v.)	1:14-cr-306-GBL-6
)	
OMAR DE JESUS CASTILLO,)	
Defendant.)	
_____)	

MOTION TO ADOPT CO-DEFENDANT'S
MOTION *IN LIMINE* TO EXCLUDE EXPERT TESTIMONY

COMES NOW your defendant OMAR DE JESUS CASTILLO, by counsel, and moves this Honorable Court for leave to join co-defendant PEDRO ANTHONY ROMERO CRUZ's Motion *In Limine* to Exclude Expert Testimony (Doc. 797). Further, Defendant Castillo requests that Juan Ramos and Vania Vargas, in addition to Sandra D'Sa and Liliana Portwine, be excluded, or that the Government produce supplemental expert notices as to those experts as well. Mr. Ramos and Ms. Vargas provided translation services for recorded phone calls, similar to Ms. D'Sa and Ms. Portwine, and the expert notices for Mr. Ramos and Ms. Vargas were similar to those for Ms. D'Sa and Ms. Portwine. Therefore, any ruling that applies to Ms. D'Sa and Ms. Portwine should also apply to Mr. Ramos and Ms. Vargas.

Dated: March 26, 2016

Respectfully Submitted,
OMAR DE JESUS CASTILLO
By Counsel

/s/ Meredith M. Ralls

Katherine Martell, VSB 77027
kmartell@firstpointlaw.com
FirstPoint Law Group P.C.
10615 Judicial Drive, Suite 101
Fairfax, VA 22030
Tel: 703-385-6868
Fax: 703-385-7009

Meredith M. Ralls, VSB 82548
mralls@oldtownadvocates.com
Old Town Advocates P.C.
9306 Grant Avenue
Manassas, VA 20110
Tel: 571-292-5651
Fax: 703-361-6400

Counsel for Defendant Omar Dejesus Castillo

CERTIFICATE OF SERVICE

I hereby certify that on March 26, 2016 the foregoing Motion was electronically filed with the Clerk of Court's CM/ECF system, which then generates a Notice of Electronic Filing (NEF) to all counsel of record in this matter.

/s/ Meredith M. Ralls
Katherine Martell, VSB 77027
kmartell@firstpointlaw.com
FirstPoint Law Group P.C.
10615 Judicial Drive, Suite 101
Fairfax, VA 22030
Tel: 703-385-6868
Fax: 703-385-7009

Meredith M. Ralls, VSB 82548
mralls@oldtownadvocates.com
Old Town Advocates P.C.
9306 Grant Avenue
Manassas, VA 20110
Tel: 571-292-5651
Fax: 703-361-6400

Counsel for Defendant Omar Dejesus Castillo